

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

PUBLIC UTILITIES
COMMISSION

2009 DEC -7 P 1:28

FILED

In the Matter of the Application)
) DOCKET NO. 2009-0048
 of)
)
 MOLOKAI PUBLIC UTILITIES, INC.)
)
 For review and approval of rate)
 increases; revised rate schedules;)
 and revised rules.)
 _____)

**COUNTY OF MAUI'S SUPPLEMENTAL INFORMATION REQUESTS TO
MOLOKAI PUBLIC UTILITIES, INC.**

and

CERTIFICATE OF SERVICE

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DEPARTMENT OF THE CORPORATION
COUNSEL
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Attorneys for County of Maui

**COUNTY OF MAUI'S SUPPLEMENTAL INFORMATION REQUESTS TO
MOLOKAI PUBLIC UTILITIES, INC.**

COUNTY OF MAUI (the "County"), by and through its attorneys, BRIAN T. MOTO, Corporation Counsel, JANE E. LOVELL, Deputy Corporation Counsel, and BRONSTER HOSHIBATA, submits its Supplemental Information Requests to Molokai Public Utilities, Inc. ("MPU") as follows:¹

County-IR-21:

Please describe in detail and provide documents and information concerning the accounts payable amount of \$49,266 listed on MPU's Balance Sheet dated December 31, 2008 (contained in the Audited Financial Statements for December 31, 2008).

County-IR-22:

Please describe in detail and provide documents and information explaining the amount owing of \$3,645,969 to MPU's parent company, Molokai Properties, Ltd. ("MPL") and affiliates as reflected on MPU's Balance Sheet dated December 31, 2008 (contained in the Audited Financial Statements for December 31, 2008).

¹ In response to the County's Information Requests filed and served November 9, 2009, MPU objected to the majority of the County's requests on the grounds of relevance, unreasonably broadening the issues, and unduly delaying this proceeding. The County disagrees with MPU's objections and pursuant to the procedural order filed November 6, 2009, the County will be proposing to meet and confer with counsel for MPU to attempt to work through these issues. If necessary, the County will file a motion to compel and if granted, reserves its right to supplement its Information Requests based on the information disclosed by MPU.

County-IR-23:

Please explain why MPL charged MPU \$214,640 for water as set forth on MPU's Balance Sheet dated December 31, 2008 (contained in the Audited Financial Statements for December 31, 2008).

County-IR-24:

Please explain how expenses relating to salaries and wages were allocated from MPL as noted in the Audited Financial Statements for December 31, 2008.

County-IR-25:

Please identify all MPU employees and whether these employees are also employed by MPL and affiliated companies, including but not limited to, Wai'ola O Moloka'i, Inc. and Mosco, Inc.

County-IR-26:

Please identify and explain the allocated expenses from MPL which are noted on note 5 as "Other" expenses of \$25,266 in the Audited Financial Statements for December 31, 2008.

County-IR-27:

Please identify and explain the professional fees of \$50,141 which are reflected on MPU's Statement of Operations for the year ending December 31, 2008 (contained in the Audited Financial Statements for December 31, 2008).

County-IR-28:

Please explain whether any affiliated companies, including but not limited to, MPL and Kaluakoi Water, LLC, have noted or claimed any depreciated costs on their financial statements or income tax returns for MPU's property, plant, and

equipment which, according to MPU's Audited Financial Statements, includes land, treatment plant, reservoir, pipes, water meters, and other.

County-IR-29:

Please identify and explain the depreciated cost of "Other" of \$64,430 as noted on note 3 of MPU's Audited Financial Statements.

County-IR-30:

Please explain the expenses of \$35,129 identified as "Other" on MPU's Statement of Operations as reflected in MPU's Audited Financial Statements for the year ending December 31, 2008.

County-IR-31:

Please identify and explain the \$609,979 reflected as owing to MPL and affiliates noted on MPU's Statement of Cash Flows as reflected in MPU's Audited Financial Statements for the year ending December 31, 2008.

County-IR-32:

Please explain why MPU paid rent of \$130,177 for use of the Molokai Irrigation System ("MIS") when Kaluakoi Water, LLC is the entity responsible for paying rent to the State Department of Agriculture for use of the MIS to transport water from Well 17.

County-IR-33:

Please explain the reason for the decrease in the number of customers for Usage Billing from 06/30/07 to 06/30/09. For example, the Attachment to CA-IR-82c reflects the number of customers for Usage Billing for 5/8" meter (200) was 2,138 as of 06/30/07, 2,262 as of 06/30/08, and then was

substantially reduced to 590 as of 06/30/09. Another example of the decrease is illustrated by 3.0" meter (205) which reflects the number of customers for Usage Billing as 36 as of 06/30/07, 36 as of 06/30/08, and then was substantially reduced to 9 as of 06/30/09.

DATED: Honolulu, Hawaii, December 7, 2009.

A handwritten signature in black ink, appearing to read 'Margery S. Bronster', written over a horizontal line.

MARGERY S. BRONSTER
JEANNETTE H. CASTAGNETTI
MARGUERITE S. NOZAKI
Bronster Hoshibata

BRIAN T. MOTO
JANE E. LOVELL
EDWARD S. KUSHI, JR.
Department of the Corporation Counsel

Attorneys for County of Maui

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| and revised rules. |) | |
| _____ |) | |

CERTIFICATE OF SERVICE

Pursuant to Hawaii Administrative Rules § 6-61-21(d), the undersigned certifies that a true and correct copy of the foregoing document was duly served on the following parties on December 7, 2009, at their last known addresses in the manner specified below:

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WEST MOLOKAI ASSOCIATION

U.S. MAIL

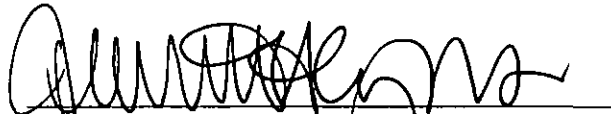
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HAND DELIVERY

DATED: Honolulu, Hawaii, December 7, 2009.



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